

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

FILED

JUL 22 2024

STEPHEN MATTHEW AVDEEF,

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CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

Petitioner & Google Crime Victim

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**Statement of Facts**

1. Your Honor, if it pleases the court, Movant would now like to humbly and respectfully request this honorable court to hold Defendant Google responsible for their ruthlessly cruel campaign of federal criminal and international acts of retaliation and personal destruction of a Google crime victim, now being ignored.

2. On or about Tuesday, May 7th, 2024, a true and correct copy of the '*Motion For Sanctions Pursuant To Criminal Deprivation of Rights Through Illegal Search and Seizure Pursuant To 'BIVENS'*' was electronically served upon Defendant Google, and was in turn served by Federal Express delivery service (7762 5986 1586) upon Plaintiff, The State of Texas, by and through Chief Counsel, Texas Attorney General Ken Paxton who has chosen not to properly respond.

3. In addition, on or about Tuesday, May 28th, 2024, a true and correct copy of the '*Amended Motion For Sanctions*' was electronically served upon Defendant Google, VP, Ken Walker who is now pretending that Movant no longer exists.

4. Therefore, as of Monday, July 22nd, 2024, a total of **SEVENTY-SIX (76)** **CALENDAR DAYS** have expired from Defendant Google's electronic service of the aforementioned '*Motion For Sanctions....*'

5. Furthermore, as of Monday, July 22nd, 2024, a total of **FIFTY-FIVE (55)** **CALENDAR DAYS** have expired from Defendant Google's electronic service of the aforementioned '*Amended Sanctions*.'

### Legal Argument

6. Directly pursuant to the well-established legal precedent and under the color of law, when a Defendant is served with legal allegations of wrong doing by and through the act of '*Motion Practice*,' and thus if that Defendant refuses to answer by their own volition, then the allegations are, **DEEMED ADMITTED**.

7. If in fact, Defendant Google, was wholly expecting to be treated as a Federal Government Agency, thus a United States Government/NSA Spying/Military Contractor, and was expecting the Federal Court to honor the forty-five (45) to sixty (60) day response time, that time has in fact been expended by default.

8. The material fact that the aforementioned time requirement granted to government agencies depending on status, was in fact a subject of demonstrative acts of Federal Criminal Fraud, outright perjury, and the criminal concealment of Federal Criminal Material Evidence. That in fact, Defendant Google successfully lied their way out of ever being held responsible for, through a highly salacious and defamatory act of '*FRAUD UPON THE COURT*' in '*Avdeef v. Google*' as Defendant Google maliciously and deviously defrauded the court into concealing Defendant Google's U.S. Military and United States Government Legal Standing.

9. Both Defendant Google and the Law Firm of Phelps & Dunbar were properly served both Certificate of Conference, and each aforementioned Motion, and both criminally conspirative entities maliciously chose, NOT TO ANSWER!

10. A '*Motion For Sanctions*' has always been viewed by the courts as a forcible demand for answers, and a court ordered request for '*admission(s)*' for the truth, once the court accepts and files the punishable motion for sanctions. Thus, the court should now consider the argument that a motion for sanctions should be viewed as a pre-emptive '*Request For Admissions*,' pursuant to the fact that the Movant/Petitioner crime victim that was brutalized through acts of Defendant's vicious retaliation, is without the right of '*Discovery*', pursuant to the fact that Movant/Petitioner, is not a party to the Federal Civil Litigation action.

11. Pursuant to FEDCIV Rule. 36, '*Request For Admissions*,' if the admission requests are ignored by the recipient Defendant, then the sought after requests for the truth, are in fact, DEEMED ADMITTED. After several months of deafening silence, Defendant Google and the criminal conspirators at Phelps & Dunbar who have escaped justice for global crimes up to this point, have all REFUSED TO ANSWER with the TRUTH, and are knowingly re-victimizing Movant/Petitioner.

12. Therefore, the act of issuing sanctions from the bench is a court enacted '*Summary Judgment*' that is levied against the unacceptable actions, and thus in this case, the numerous Federal and International criminal acts that should be referred by this court to the DOJ and The Office of The United States Attorney for investigation and prosecution, should be treated as harshly as possible within legal limits. Thus, these actions fall under FEDCIV Rule. 56, '*Summary Judgment*.'

**Conclusion and Prayer**

13. This is a cry from the dark from a family of crime victims that have been silenced into submission by a Democratic political party enforcer, that at the moment, has complete criminal autonomy from an equally corrupt Biden run DOJ. The crimes that are being suppressed, are stunning in the scope of Federal and International Corruption, and that lead all the way back to then VP Biden, and the Obama administration, thus crimes to conceal this matter all the way to retaliatory murder, are knowingly acceptable by the DOJ, Office of The Inspector General!

14. Criminally and unmercifully attacking a '*Friend of The Court*' Amicus Brief Petitioner, should be severely punished by this court, and should now lead to an additional monetary sanction of one-hundred & eighty million (\$180,000,000.00), for the eighteen (18) years of brutality perpetrated by Defendant Google against Movant's entire family, beginning at the original Copyright theft that took place in 2007, all the way to the present global computer theft(s) and distribution in 2024.

15. **Innocent people will do whatever it takes to proclaim their innocence!**

16. Petitioner now pleads with this court to sanction Defendant Google LLC in the amount of eight-hundred and ninety-nine million, seventy-thousand dollars, (\$899,070,000.00) that will now in turn set a clear and concise example that global Copyright Theft, the criminal redistribution of stolen Copyright and stolen Intellectual Property, will not be tolerated by U.S. or INTERNATIONAL LAW.

**CERTIFICATE OF SERVICE**

17. On or about Thursday, July 18th, 2024, Defendant Google was properly served a Certificate of Conference in regards to this pending legal issue for argument now before this court. Defendant Google wholly failed to respond in a timely manner after attacking a theft victim then ignoring the issue until it goes way; is not an equitable or proper legal defense! Therefore this motion for Directed Verdict is now being presented to this honorable court for legal consideration.

18. On or about Monday, July 22nd, 2024, a true and correct copy of this Motion will be properly served upon Defendant Google, & in turn a hard copy was mailed to Plaintiff, The State of Texas, Chief Counsel Ken Paxton by USPS mail.

DATED this 22<sup>nd</sup> day of July, 2024.

Respectfully submitted,

  
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*cc: President Donahue of The Hague, the E.U.I.P.O., The World Court of Justice, The DOJ, FBI, Inspector General of the United States of America, U.S. Speaker of the House Mike Johnson, Senator Jim Jordan, Senator Josh Hawley, Former President The Honorable Donald J. Trump, Fox News Sean Hannity, and our London Barrister, Attachment to the Impending United States Federal District Court Litigation Complaint, Attachment to the E.U.I.P.O. International IP and Copyright Theft Complaint, Attachment to Part Three of Three (3 of 3) of the requested World Court of Justice International Criminal Human Rights Violation Pleading to The Hague.*